

EXHIBIT G
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

--oOo--

WAYMO LLC,

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

_____/

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VIDEOTAPED 30(b)(6) DEPOSITION OF GARY BROWN

VOLUME II

WEDNESDAY, SEPTEMBER 6, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2693569

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1 organizes a bunch of different log sources. And, 13:51:44
2 again, the focus of our investigation was the -- 13:51:51
3 primarily the Windows laptop, from my perspective. 13:51:55
4 And then from Kristinn's perspective, I believe he was 13:51:58
5 doing some work on the Linux laptop. 13:52:02
6 And since we had found an unusual sequence of 13:52:11
7 events that I went through several times in our 13:52:15
8 previous deposition, there was never a need to go seek 13:52:27
9 out additional devices because they wouldn't undo what 13:52:34
10 we had observed happening on the Windows laptop. 13:52:42
11 MR. BAKER: Counsel, it's 1:53. I would like to 13:52:45
12 take a break before Mr. Zbrozek's deposition. I don't 13:52:49
13 know if now is a good time. 13:52:51
14 MR. CHATTERJEE: Yeah, that's fine. 13:52:52
15 MS. GOODMAN: Okay. 13:52:54
16 THE VIDEOGRAPHER: Just breaking or closing? 13:52:56
17 MR. CHATTERJEE: We're breaking. We're going to 13:53:00
18 be doing another deposition in between. 13:53:02
19 THE VIDEOGRAPHER: Going off the record. The time 13:53:03
20 is 1:53 p.m. 13:53:05
21 (Whereupon, the proceedings were adjourned at 13:53:05
22 1:53 p.m. and resumed again at 6:04 p.m.)
23 THE VIDEOGRAPHER: Back on the record. The time 18:04:05
24 is 6:04 p.m. 18:04:08
25 MR. BAKER: And, Counsel, just while I'm thinking 18:04:11

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1 about it, I want to mark the transcript highly 18:04:13
2 confidential, please. 18:04:15
3 BY MS. GOODMAN:
4 Q. Mr. Brown, what did you do during the 18:04:17
5 multi-hour break in your deposition? 18:04:21
6 A. I watched Netflix. 18:04:23
7 Q. Did you discuss your testimony with anybody 18:04:27
8 during that break? 18:04:28
9 A. I did not. 18:04:29
10 Q. Okay. I want to ask you some more questions 18:04:33
11 about Exhibit 2215, which should be in front of you. 18:04:38
12 A. Yes. 18:04:38
13 Q. Okay. If you look at page 86896, on October 18:04:56
14 6th, Mr. Gorman is writing, "The goal ultimately is to 18:05:01
15 figure out why he was doing whatever he was doing in 18:05:05
16 December 2015 and January '16." 18:05:09
17 Do you see that? 18:05:09
18 A. I do see that. 18:05:10
19 Q. So do you understand -- strike that. 18:05:13
20 Was it your understanding in October 2016 18:05:15
21 lawyers were trying to figure out what Anthony 18:05:18
22 Levandowski was doing and why he was doing it in that 18:05:22
23 time period? 18:05:23
24 A. It says it right here, so, yes. 18:05:26
25 Q. So you understood that was -- you were being 18:05:30

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1 BY MR. CHATTERJEE: 20:52:59

2 Q. [REDACTED] 20:53:03

3 A. I don't. 20:53:05

4 Q. [REDACTED]

5 [REDACTED]

6 [REDACTED] 20:53:17

7 Q. Yes. 20:53:18

8 A. Yes. 20:53:19

9 Q. What is that? 20:53:20

10 A. I believe it will provide metadata around a 20:53:25

11 file system. 20:53:27

12 Q. [REDACTED] 20:53:36

13 MR. BAKER: Objection to form. 20:53:37

14 THE WITNESS: I was not hands-on on the 20:53:40

15 Levandowski laptops. That would have been Kristinn. 20:53:47

16 BY MR. CHATTERJEE: 20:53:47

17 Q. [REDACTED]

18 [REDACTED] 20:53:55

19 MR. BAKER: Objection to form. 20:54:01

20 THE WITNESS: That seems like it would describe -- 20:54:04

21 or could describe a code repository that is off corp. 20:54:09

22 BY MR. CHATTERJEE: 20:54:09

23 Q. [REDACTED]

[REDACTED]

[REDACTED] 20:54:20